

**REMARKS**

Thorough examination of the application is sincerely appreciated.

According to the Final Office Action, claims 1-13 and 15-20 were rejected under 35 U.S.C. § 102(a) as anticipated by Hsieh et al (Transpose Memory for Video Rate JPEG Compression on Highly Parallel Single-Chip Digital CMOS Imager, IEEE Proceedings, September 10-13, 2000). Claim 14 was objected to as being dependent on a rejected base claim, but found to contain an allowable subject matter. In response, Applicant respectfully disagrees with, and explicitly traverses, the reasons for rejecting Applicant's claims 1-13 and 15-20.

To expedite the prosecution of the application and without conceding any Examiner's statements or waiving any Examiner's arguments in the Final Office Action, Applicant petitions to accept an unintentionally delayed claim for priority to International Application No. PCT/EP00/11652 filed on November 23, 2000, and published as WO 01/42902 A1 on June 14, 2001. A separate petition was filed with the Office for Petitions in the USPTO. Based on the International Application No. PCT/EP00/11652 claiming priority to European Application 99204181.4 filed December 10, 1999, it is respectfully submitted that Applicant's effective filing date is December 10, 1999, in full compliance with 35 USC 365(a) and 35 USC 119. As is apparent from the date of the reference relied upon in the Final Office Action to reject Applicant's claims 1-13 and 15-20, it does not qualify as prior art.

At least for the above reasons, Applicant submits that the rejections of claims 1-13 and 15-20 have been overcome and can no longer be sustained. Applicant respectfully requests withdrawal of the rejections and allowance of the claims.

An earnest effort has been made to be fully responsive to the Examiner's correspondence and advance the prosecution of this case. In view of the above remarks, it is believed that the present application is in condition for allowance, and an early notice thereof is earnestly


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solicited. However, if for any reason this application is not considered to be in condition for allowance, the Examiner is respectfully requested to call the undersigned attorney at the number listed below prior to issuing a further Action.

Please charge any additional fees associated with this application to Deposit Account No. 14-1270.

August 8, 2006

Respectfully submitted,

By 

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